

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

ROBERT STOUD

Plaintiff

v.

SUSQUEHANNA COUNTY

Defendant

CIVIL ACTION

No. 3:17-CV-2183-MEM

JOINT MOTION TO CONTINUE STAY OF CASE

NOW COMES, the respective parties, by and through their respective counsel, and in support of this motion, aver as follows:

1. The parties in this matter underwent mediation with Joseph A. Barrett, Esquire.
2. While a settlement of the case did not occur at the mediation, the parties continue to have dialogue regarding settlement.
3. The parties agree to a stay of all proceedings for 30 additional days in this case pending the continued settlement dialogue.
4. If after 30 days no settlement is reached, new deadlines for expert reports will be set by the parties.

WHEREFORE, the parties respectfully request that this Honorable Court grant the relief requested herein.

Respectfully Submitted:

/s/ Gerard M. Karam, Esquire
Gerard M. Karam, Esquire
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/s/ Christopher J. Szewczyk, Esquire
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Attorneys for the Plaintiff

/s/ A. James Hailstone, Esquire
A. James Hailstone
Bar I.D. # PA80055
Attorney for Defendant

Date: March 5, 2019

CERTIFICATE OF CONCURRENCE

The undersigned hereby certifies that on March 5, 2019, he contacted A. James Hailstone, Esquire requesting concurrence in the foregoing motion.

Attorney Hailstone concurs in Plaintiff's request.

/s/ Christopher J. Szewczyk, Esquire
Christopher J. Szewczyk, Esquire
Mazzoni, Karam, Petorak, and
Valvano
321 Spruce Street
Suite 201
Scranton, PA 18503
(570) 348-0776

Dated: March 5, 2019

CERTIFICATE OF SERVICE

I, Gerard M. Karam, Esquire, hereby certify that I have served a true and correct copy of the foregoing document via electronic service/ECF system on the 6th day of March, 2019.

/s/ Gerard M. Karam, Esquire
Gerard M. Karam, Esquire